

“Draft” -- Information/Suggestions for reviewing CZARA public comments

The following provides information/suggestions to help those of us who are reviewing public comments received on the NOAA/EPA proposed decision to disapprove the State of Oregon’s CNPCP.

For those without a good background in the Oregon CZARA history, a good start would be to review the December 20, 2013 Proposed Decision Document. Pay special attention to how the December letter addresses the specific issue(s) you will be focusing, i.e., Ag, OSDS, New Development, etc.

Next it would be good for each reviewer to review some of comment letters we received just to get familiar with the types of letters that were submitted. The letters can be found at:

<http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/publicComments.html>. Letter 1 is a good example of a “simple” letter; Letter 80 is “moderately” complex and Letter 57 is “very” complex.

Following a quick look at the list of letters, I suggest doing a review of the xl spreadsheet Allison established which summarizes specific components of each letter. The spread sheet includes identifiers such as the name of the entity submitting the letter, the summary of main comments and the “Category” of comments”. The “Category of Comments” column really focuses on the issues raised in the letters. The issues generally fall into the following subject areas: 1. General comments, 2. On-site Sewage Disposal, 3. New Development, 4. Ag, 5. Forestry Roads and Landslides, 6. Forestry – Riparian, and 7. Pesticides. Please note that the spreadsheet may not have captured all of the specific comments in a specific letter. Reviewers will need to take a very close look at the letters to make sure all of the appropriate comments are captured.

Team leaders have been established for each of the seven subject areas. The leaders are 1. Allison for General comments, 2. Don for OSDS, 3. Don for New Development, 4. Alan for Ag, 5. Chris Solloway for Forestry Roads and Landslides, 6. Alan for Forestry – Riparian, and 7. Jenny for Pesticides. Each team leader will establish a team of reviewers to assist in reviewing the letters for the specific issues/groups.

It would be good for the team leaders to identify all of the letters that address the specific “issue(s)” your team will focus on. For example, for Ag, I went through the spreadsheet and identified 29 letters that included statements about Ag. These will be the letters our Ag team will initially review. For workload purposes, I determined which letters were “simple”, “moderately complex” or “very complex”. For the Ag Team, two team members were assigned two very complex and 12 simple letters to review while the other two members were assigned the rest of the letters. Every letter will get reviewed by at least two reviewers.

The team members were also provided Allison's two page "Summary on NOAA and EPA Response to Comments Regarding the Agencies' Proposed Finding that Oregon has Failed To Submit a Fully Approvable Coastal Nonpoint Program". This provides the framework on how the reviewers will capture and summarize the key points in each comment letter and code that specific comment to the specific comment letter.

The next step will be to share the captured and summarized comments with the CZARA Project Team. After receiving their input, the review team will begin developing draft responses to the comments.

The review team will also identify the reference documents included in each comment letter. We plan to use contractual support to review the reference documents and determine if the documents support the specific points being made in comment letters.